

To: Harding, George[harding.george@epa.gov]
Cc: COUTU Clary[clary.coutu@keoliscs.com]; HAZLE Dean[dean.hazle@keoliscs.com]; Bill
Better[bbetters@cdwconsultants.com]
From: Marian Rambelle[mrambelle@cdwconsultants.com]
Sent: Tue 4/18/2017 9:52:14 PM (UTC)
Subject: RE: MA0003590 - Cyanide and Lead results in effluent sampling for EPA additional sampling

Hi George,

Thank you for taking the time to call today and confirming that our email notifications will satisfy written submissions to EPA. As we discussed, we will continue to check effluent results against the national surface water quality criteria and notify you orally and by email for any results over the criteria.

As I noted, the 2015 MSGP Benchmark Values (Table 8.K-1) for the Hazardous Waste TSDFs subsector perhaps may be seen as somewhat of a reference point (although not directly applicable to the facility’s subsector). The cyanide and lead results in the effluent are well below the benchmark values, which are:

- Cyanide – 22 ug/l
- Lead – 45 ug/l for a Hardness level of 63.5 mg/l in the receiving water (sampled same day)

Thank you,
Marian

Marian Rambelle
Senior Environmental Engineer

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From: Harding, George [mailto:harding.george@epa.gov]
Sent: Tuesday, April 18, 2017 3:53 PM
To: Marian Rambelle <mrambelle@cdwconsultants.com>
Cc: COUTU Clary <clary.coutu@keoliscs.com>; HAZLE Dean <dean.hazle@keoliscs.com>; Bill Better[bbetters@cdwconsultants.com]
Subject: RE: MA0003590 - Cyanide and Lead results in effluent sampling for EPA additional sampling

Hi Marian,

Thank you for the report on the sampling results from the Commuter Rail Maintenance Facility. Just want to confirm as we discussed this afternoon that your e-mail satisfies any requirement for a written submission regarding the cyanide and lead results.

Please feel free to contact me if you have any questions.

George

George W. Harding, P.E.
Water Enforcement Unit

Phone: 617-918-1870
Fax: 617-918-0870

From: Marian Rambelle [<mailto:mrambelle@cdwconsultants.com>]
Sent: Friday, April 14, 2017 4:37 PM
To: Harding, George <harding.george@epa.gov>
Cc: COUTU Clary <clary.coutu@keoliscs.com>; HAZLE Dean <dean.hazle@keoliscs.com>; Bill Betters <bbetters@cdwconsultants.com>
Subject: MA0003590 - Cyanide and Lead results in effluent sampling for EPA additional sampling

Hello George,

Per my voicemail to you this afternoon, I provided oral notification on behalf of our client, Keolis Commuter Services, of an effluent sample result that exceeded the freshwater aquatic chronic criteria for cyanide and lead. The sample was collected at the MBTA Commuter Rail Maintenance Facility (CRMF) (NPDES permit no. MA0003590). This is the 2nd biweekly sample collected at the permit-required effluent sampling location at Drain Manhole (DMH) 13.4 under the sampling program requested in EPA's Section 308 letter dated March 2, 2017, as described in my 3/31/17 email. This sampling program is being conducted to support the development of the reissuance of the permit.

The 2nd biweekly sample was collected on April 5, 2017. At DMH 13.4, Total cyanide was detected at a concentration of 9 ug/l in the DMH 13.4 sample. Similar to the 1st biweekly sample, this result slightly exceeds the National Recommended Water Quality Criteria – Freshwater Aquatic (CCC) (chronic) (8/22/2013) for cyanide of 5.2 ug/l. In addition, Lead was detected in this sample at a concentration of 7.93 ug/l. This result slightly exceeds the National Recommended Water Quality Criteria – Freshwater Aquatic (CCC) (chronic) (8/22/2013) for lead of 2.5 ug/l.

Three additional biweekly sampling rounds will be conducted per EPA's Section 308 letter and the results will be closely monitored. Please let us know if you would like to receive a written submission regarding this 2nd biweekly effluent sample's cyanide and lead results. Please let us know if you have any questions.

Thank you,
Marian

Marian Rambelle
Senior Environmental Engineer

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